



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

8708-0807  
ORIGINAL  
(Red)

JAN 30 1986

Charles Sloan, President  
United Rigging & Hauling  
6701 Ammendale Road  
Beltsville, MD 20705

Dear Mr. Davis:

On May 13, 1985, a polychlorinated biphenyl (PCB) inspection was conducted at United Rigging & Hauling, located on Conway Road. Enclosed you will find the inspection report documenting the occurrence and findings of that inspection. The report is undergoing preliminary EPA review at this time.

Please be advised that any violations of the PCB rule subject United Rigging & Hauling to possible enforcement action including, but not limited to, an administrative action for the imposition of civil penalties pursuant to Section 16 of the Toxic Substances Control Act, 15 U.S.C. Section 2615.

If you have any questions concerning this correspondence, I can be reached at (215) 597-4651.

Sincerely,

*Christopher B. Pilla*

Christopher B. Pilla  
PCB Compliance Monitoring Coordinator

Enclosures

cc: Larry S. Miller

ORIGINAL  
(Red)  
REPORT OF INSPECTION TO DETERMINE COMPLIANCE  
WITH THE TOXIC SUBSTANCES CONTROL ACT (TSCA) REGULATIONS

United Rigging and Hauling  
12120 Conway Road  
Beltsville, Maryland 20705

Inspection #85-017

August 7, 1985

Performed for: Environmental Protection Agency  
Region III  
Grant No. CS-809752-01-0  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

Performed by: State of Maryland  
Department of Health and Mental Hygiene  
Waste Management Administration  
201 West Preston Street  
Baltimore, Maryland 21201

August 12, 1985

To: K.K. Wu  
EPA Region III  
Philadelphia, Pennsylvania

From: Barry E. Chambers  
TSCA Inspector  
Maryland State Department of Health and Mental Hygiene

Subject: PCB (TSCA) Inspection  
United Rigging and Hauling  
12120 Conway Road  
Beltsville, Maryland 20705

General Information:

A site inspection was conducted at the subject facility on May 13, 1985 beginning at 1300 hours. The purpose of the inspection was to inspect, document and verify the facility's compliance with the Federal Toxic Substances Control Act (TSCA) Regulations (40 CFR 761). The specific objective of the inspection was to ascertain the facility's compliance with PCB item, user/storage regulations.

Facility and Responsible Official:

United Rigging and Hauling  
12120 Conway Road  
Beltsville, Maryland 20705  
Charles E. Sloan, President

Inspection Participants:

Charles E. Sloan, President, United Rigging and Hauling  
Du Witt C. Sperau, United Rigging and Hauling  
Douglas R. Thomas, Attorney, United Rigging and Hauling

Barry E. Chambers, TSCA Inspector #MD-004, State of Maryland  
Greg Sonberg, Sanitarian, State of Maryland  
Karen D. Gray, TSCA Inspector #MD-013, State of Maryland

Dave Wright, Environmental Protection Agency

Inspection Activities:

Upon arriving at the facility, proper credentials were presented to Mr. Sloan for review. The notice of inspection form was completed and signed by Mr. Sloan (attachment #1).

After discussion of the confidentiality notice and the explanation of the criteria necessary to meet confidentiality requirements, the notice of confidentiality form was signed by Mr. Sloan. Also, the claiming of confidentiality was waived by the facility being inspected (attachment #2).

At this time, a brief discussion of the reason for the inspection and the applicable laws and regulations followed.

Facility Information:

The United Rigging and Hauling facility located on Conway Road is the warehouse operation for this company's Ammendale Road facility. At the warehouse, a variety of large equipment is stored awaiting shipment to a customer's facility. The company frequently accepts transformers for hauling and may store them for a rental fee based on cubic feet of storage. The warehouse is approximately 25-30,000 square feet in size. In addition, there is roughly two-three acres of property surrounding the building.

Mr. Sloan informed the inspectors that the warehouse is currently up for sale. However, as yet, the company has not received a firm offer.

Inspection Narrative:

The inspectors met with Mr. Sloan and his representatives as well as a representative of EPA to discuss the purpose of the inspection and to question United Rigging and Hauling as to the presence or absence of PCBs. A brief outline of the TSCA regulations was given as well as an explanation of why the warehouse operation is being treated as a separate inspection from the Ammendale Road operation.

It was discovered that there are approximately nine oil-filled transformers currently in storage for alleged reuse. The transformers are not the property of United Rigging and Hauling but are stored for Electrical Equipment Contractors of Virginia. Currently, there are six transformers stored in a single row outside and on the ground. In addition, there are three transformers stored inside the warehouse.

Mr. Sloan accompanied the inspector on a tour of the warehouse and the surrounding property where photos and samples were taken and observations made.

ORIGINAL  
(Red)Transformers:

There are a total of nine oil-filled transformers currently in storage for alleged eventual reuse. These transformers are not the property of United Rigging and Hauling but are the property of Electrical Equipment Contractors (EEC). United Rigging is paid a storage fee by EEC.

There are six transformers, two of which are PCB, and are stored outside, adjacent to the warehouse. They are not pad mounted or stored on pallets, but rather have been placed directly upon the ground. The transformers nameplates contained the following information:

## 1. Westinghouse transformer

300-KVA

13800 to 208 volts

60 cycles

264 - gallons oil

SN#1960609

(found to be nonlabeled, nondated and leaking at top with liquid about to leave the surface of the transformer. An absorbent pad was placed at the spill area by the inspector)

Sample results: none detected, detection limit = 0.8 ppm PCB as 1242

## 2. Westinghouse transformer

300 KVA

13800 to 208 volts

60 cycles

264 - gallons oil

SN#1960615

(transformer found to be leaking around seals with surface of transformer moist to touch. Transformer was not labeled or dated)

Sample results: none detected, detection limit = 0.8 ppm PCB as 1242

## 3. Power Zone Transformer

225 KVA

Pri volts 4160A

Class 0anil 65° C rise

Three phase

60 cycles

1030 lbs

Askarel N-3 liquid

SN#35747

(transformer found to be nonlabeled, not dated and nonleaking)

Sample results: 560,348 ppm PCB as 1260

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(Red)

4. General Electric transformer  
225 KVA  
4160-208Y/120  
0A-class  
3 phase  
60 cycles  
65° C - rise  
Pyranol - liquid  
SN#F-964288  
(transformer found to be nonlabeled, not dated and nonleaking)

Sample results = 909,201 ppm PCB as 1242

5. Westinghouse transformer  
300 KVA  
13800 to 208 volts  
60 cycles  
55° C - rise  
264 - gallons oil  
SN#1960614  
(transformer found to be nonlabeled, not dated and nonleaking)

Sample results = none detected, detection limit = 1.2 ppm PCB as 1242

6. Westinghouse transformer  
300 KVA  
13800 to 208 volts  
60 cycles  
55° C - rise  
264 gallons oil  
SN#1960613  
(transformer found to be nonlabeled, not dated and nonleaking)

Sample results = none detected, detection limit = 0.9 ppm PCB as 1242

There are currently three transformers and one switchgear cabinet located inside the warehouse, two of which are PCB. These have been placed on the warehouse floor. Their nameplates contained the following information:

7. Power Zone transformer  
150 KVA  
0apil - class  
55° C - rise  
3 phase  
60 cycles  
72 gallons N-3  
SN#24900  
(transformer found to be nonlabeled, not dated and nonleaking)

Sample results = 754,603 ppm PCB as 1260

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(Red)

8. Westinghouse switchgear cabinet  
150 KVA  
4160Y/24000 volts  
208Y/120  
AA class  
3 phase  
AVG triplex - type  
80°C rise  
B insulation - class  
SN#15PHX  
(this cabinet contained no internal parts)

Sample results = no samples taken

9. Westinghouse transformer  
300 KVA  
13800 to 208 volts  
60 cycles  
55°C rise  
264 gallons  
SN#1960610  
(transformer found to be nonlabeled, not dated and nonleaking)

Sample results = none detected, detection limit = 0.8 ppm PCB as 1243

10. General Electric  
225 KVA  
4160-208Y/120  
60 cycles  
55°C rise  
0A class  
3 phase  
Pyranol - oil type  
SN#E-695061  
(transformer found to be nonlabeled, not dated and nonleaking)

Sample results = 955,522 ppm PCB as 1242

Capacitors:

According to Mr. Sloan, and as indicated by the inspection, there appears to be no capacitors at the Conway facility.

Hydraulic Equipment:

According to Mr. Sloan, other than hydraulic forklifts, there appears to be no large stationary hydraulics in use at the Conway facility.

(see attachment #3)

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(Red)

Photographs:

Several photographs were taken during the inspection (attachment #4).

Closing Conference:

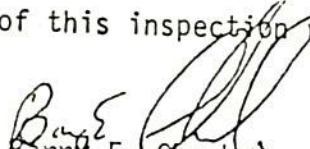
It was explained to Mr. Sloan that the transformers were in violation of the TSCA regulation in the areas of record keeping, and labeling. Mr. Sloan was advised of the necessary steps in order to bring the transformers into compliance with TSCA. Mr. Sloan informed the inspectors that a letter had been sent to Electrical Equipment of Virginia to remove the transformers as they are the owners of the transformers. It was explained that if these transformers were to be considered waste by their owners, then the transformers would have to be properly manifested according to Maryland law. Mr. Sloan was presented with the proper EPA M, PCB labels and requested that they be affixed to all PCB transformers. (at a later date, (May 16, 1985) Mr. Sloan was presented with sample inspection logs and annual reports and advised to commence inspections (quarterly) immediately).

In addition, he was advised to properly clean up and repair the two leaking non-PCB transformers.

EEC  
RESPONSIBLE

Note:

The facility has requested a copy of this inspection report when available.

  
Barry E. Chambers  
TSCA Inspector  
Maryland State Department of Health  
and Mental Hygiene

BEC:amj  
Attachments: see next page

MARYLAND STATE DEPARTMENT OF HEALTH AND MENTAL HYGIENE

Laboratories Administration

Howard and Biddle Streets

P.O. Box 3555, Baltimore, Maryland 21205

Hazardous Waste Laboratory  
Organic Analysis Report Form

Lab. No.

ORIGINAL  
Ready

NOTED OCT 4 1985 R.M.A. Priority ASAP

for SMITH 1916 5-2-85 Sample Source UNITED RUBBER & HAWAIIAN  
Name/time/date

ID No. 0502856ES02-T Preservative Used None

Alert TRENCH #2 SOIL COMPOSIT 6-8 ft depth

Custody sample possession

Regoy E. Santos 1915 5/2/85 to Paul J. Smith 1915 5-2-85  
Name/time/date Name/time/date

Paul J. Smith 2145 5-2-85 to James Milligan 2145 5-2-85  
Name/time/date Name/time/date

Name/time/date to Name/time/date

EP Toxicity Organics

PPb

endrin \_\_\_\_\_  
lindane \_\_\_\_\_  
methoxychlor \_\_\_\_\_  
toxaphene \_\_\_\_\_  
2, 4-D \_\_\_\_\_  
2, 4, 5-TP(silvex) \_\_\_\_\_

Organics Analysis

- \*Purgeable halocarbons
- \*Purgeable aromatics
- \*Acrolein & Acrylonitrile
- \*Phenols
- \*Phthalate esters
- \*Organochlorine Pesticides & PCB
- \*Nitroaromatics & Isophorone
- \*Polynuclear aromatic hydrocarbons
- \*Haloethers
- \*Chlorinated hydrocarbons
- \*see other side for specific compounds

23 ppm PCB AS 1266 in soil

25.818 ppm PCB AS 1266 in soil

Identification and comparison

Case

UNITED RIGGING &  
HAULING SITE

LARGE PINE TREE

92' 90° RIGHT ANGLE

20'

SAMPLE LOCATION

FOR SAMPLE # 050285 G.E.SOLT  
LAB SHEET 850350

SOIL COMPOSITE AT 6'-8' DEPTH

ANALYSIS INDICATES 23 PPM PCB  
IN SOIL

WHITE OAK STUMP

BLANK

ORIGINAL  
(Red)

4''

Pipe  
Slope  
Down

ORIGINAL  
(Red)

		25	25	3	5	29	8.7	190		
H										
G		95/29	82	110	10.2	10.6		27	14.2	
F	105	118	47	140	10.8	212.6	300		24.8	
E		X 57	387	534	716	124	516 311	24	70.3	
D	23	15	525	659	7126	346	27	40	22	
C	6	7.6	28	1167	752	84.4	25	7.9	11	
B	74	16	10	1760	312	750	12.6	5	10	2
A	19	X 48	2	1460	356	116	225	10	10.1	9.6
	1	2	3	4	5	6	7	8	9	10

1	2	3	4	5	6	7	8	9	10	11	12
A											
B											
C											
D											

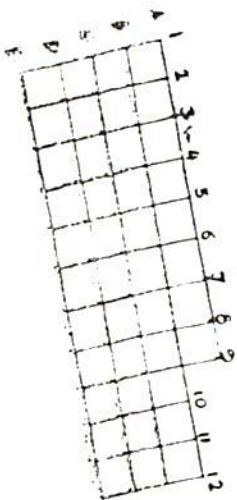
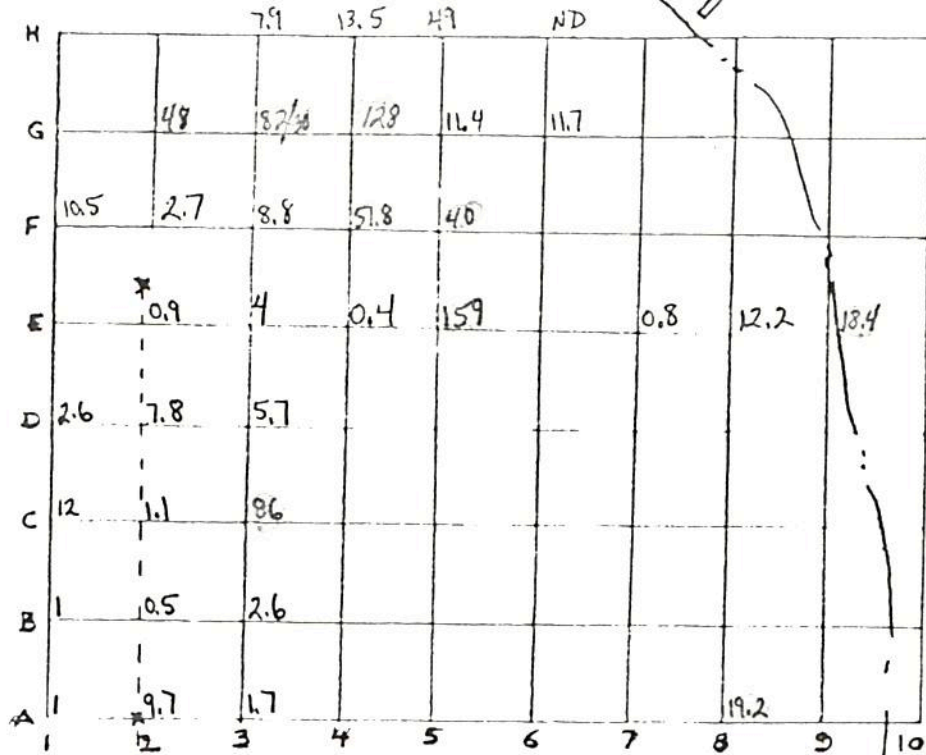
14.017  
14.0

PPE SL

12"

Pipe  
Slope  
Draw

ORIGINAL  
(Red)



SECTION  
14D

PIPE SE



27

Pipe  
Slope  
Draw

ORIGINAL  
(Red)

9.5

H									
G		6		6					
F			2.6	0.5	5.3	18	(142)	45	
E		* 9.2	7.5	2.1	H	2.8	45	45	45
D	1.9	0.3	7.5/2.5	15.7	12.2	6.2	45	45	45
C	1.8	7.1	5.0	(144)	(1590)	22.5	45	45	45
B	0.8	7.7	1.5	(15/2.4)	(2750)	19.1	45	45	45
A	0.5	0.2	2.6	(120)	(37)	13.6	4.9	(52.5)	24
	1	2	3	4	5	6	7	8	9

10

1	2	3	4	5	6	7	8	9	10	11	12
A											
B											
C											
D											

St. 011  
14D

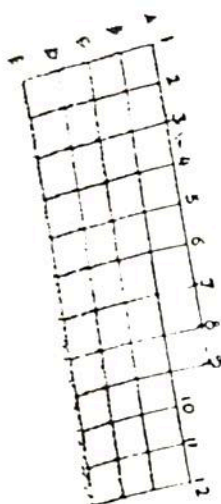
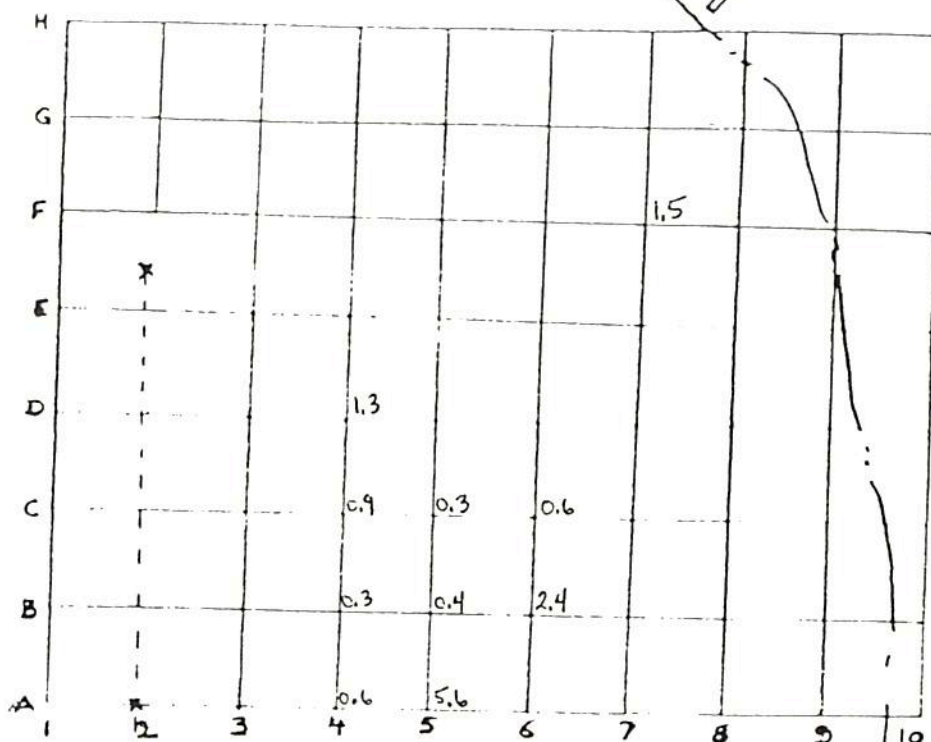
PPE SA



56

Pipe  
Slope  
Lean

ORIGINAL  
(Red)

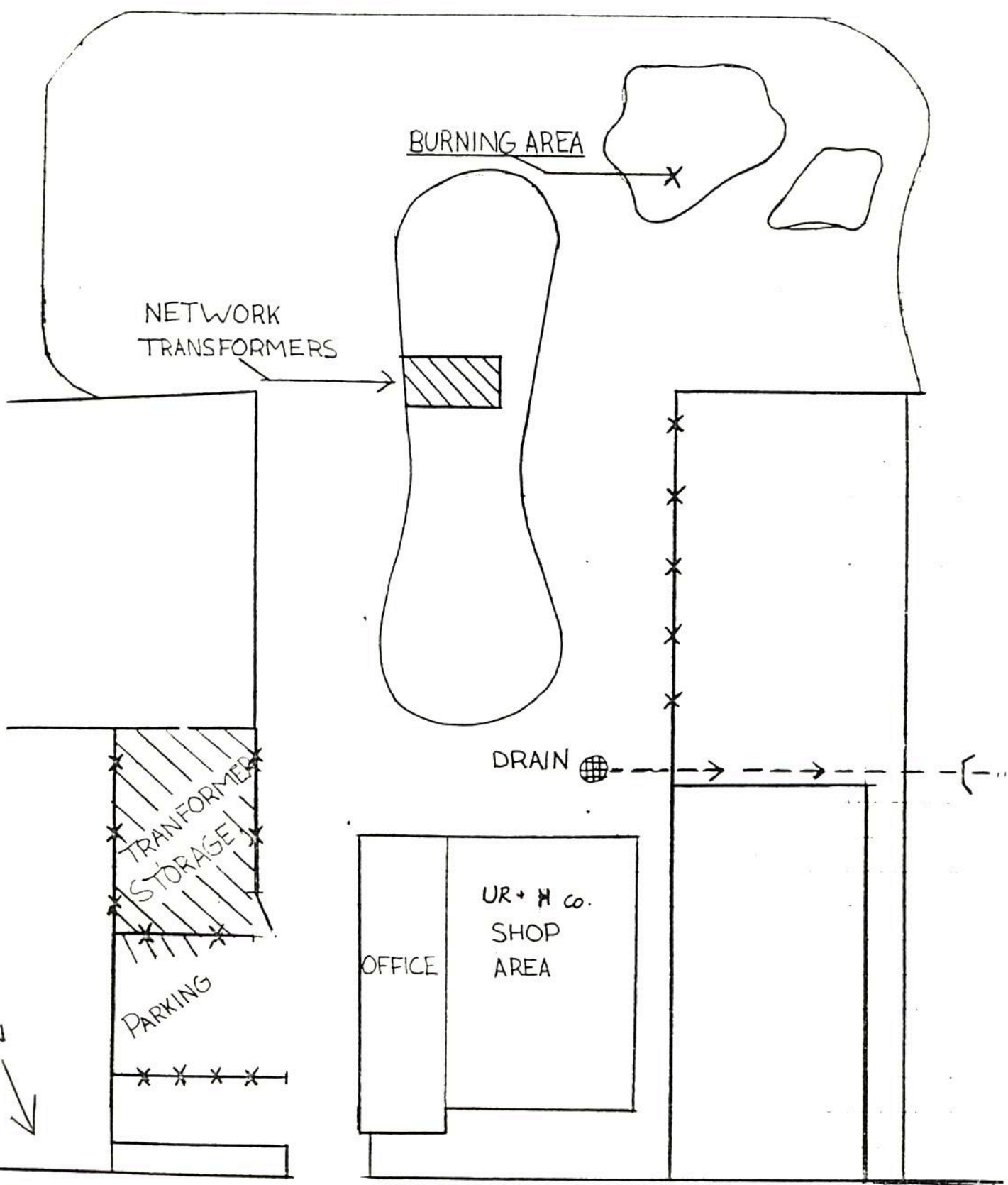


1st off  
1st D

PPE S



OPTIONAL  
(Red)





SUITE 3. 5090 CENTRAL HIGHWAY  
PENNSAUKEN, NJ 08109  
PHONE 609-663-7995

①

ORIGINAL  
(Red)

# MEMORANDUM

TO: Robert Caron, OSC, EPA Region III PCS #3375  
THRU: Steve Jarvela, DPO, EPA Region III  
THRU: Rich Habrukowich, TATL, Region III  
FROM: Mark Tucker and Greg Janiec, TATMs, Region III  
SUBJECT: Magnetic Survey: United Rigging  
DATE: July 19, 1985

On July 18, 1985 between 0900 and 1000 hours TAT members Mark Tucker and Greg Janiec met with Tom Bettendorf (MDMWA) to assess the feasibility of conducting a detailed magnetic survey using a portable proton magnetometer at the United Rigging and Hauling Site. It is our opinion that such a survey is impractical due to numerous sources of interference.

The major sources of interference are concentrated masses of iron and steel above the ground, powerlines and an operating transformer. An office trailer which serves as the PEPCO Command Post is located directly above the spot where Tom Bettendorf believes it is most likely the drums are buried.

Who?

## OBSERVATIONS

Concentrated masses of iron and steel on the site include stacks of "I beams", network transformers, junked trucks and flatbed trailers, and other scrapped items. Massive iron and steel items such as these can affect magnetic readings up to distances of 50 to 100 feet or more. Large masses of above ground iron and steel can "blot out" the ability to detect the much smaller amount of material suspected to be buried in the form of drums.

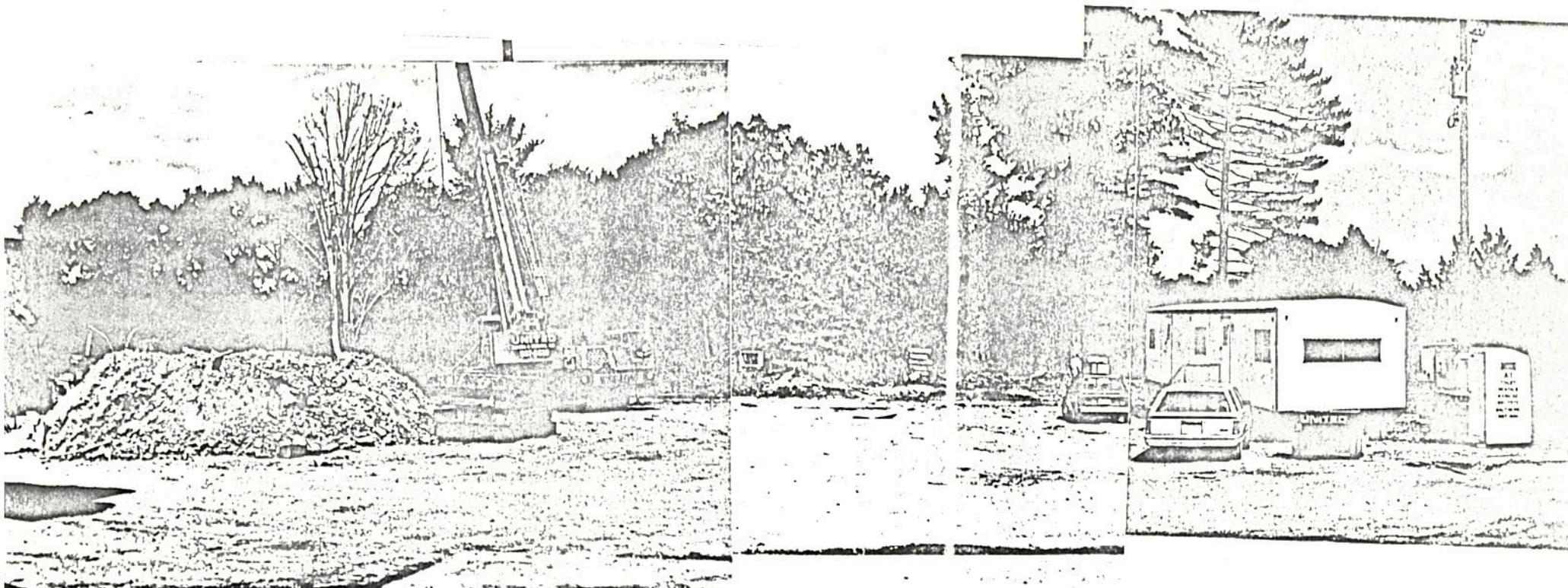
Powerlines and an operating transformer are also on the site. Sources of electricity have associated magnetic fields which produce erratic and unpredictable magnetometer readings to a considerable distance. Operating transformers are a particularly bothersome source of magnetic interference.

## RECOMMENDATION

It is our recommendation that some other method be used to locate these buried drums. One option would be to ask the backhoe operator who originally buried the drums to come on site and point out their location. Exploratory trenches could then be excavated to determine the number and extent of the buried drums.

The office trailer serving as the PEPCO Command Post sits directly above the suspected burial site and may have to be moved before further investigations.

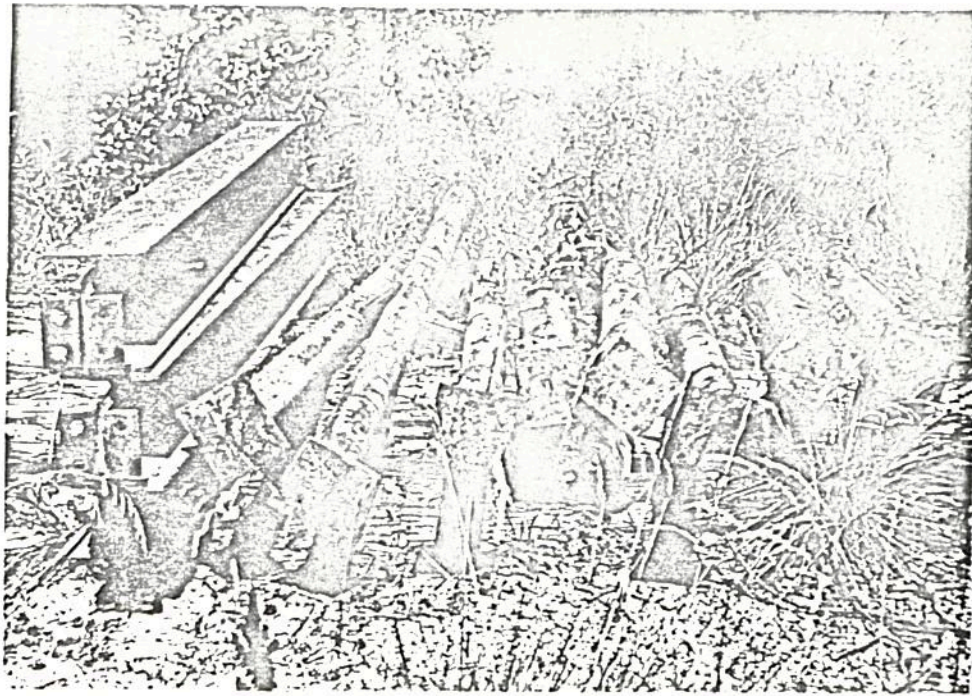
MT:1al



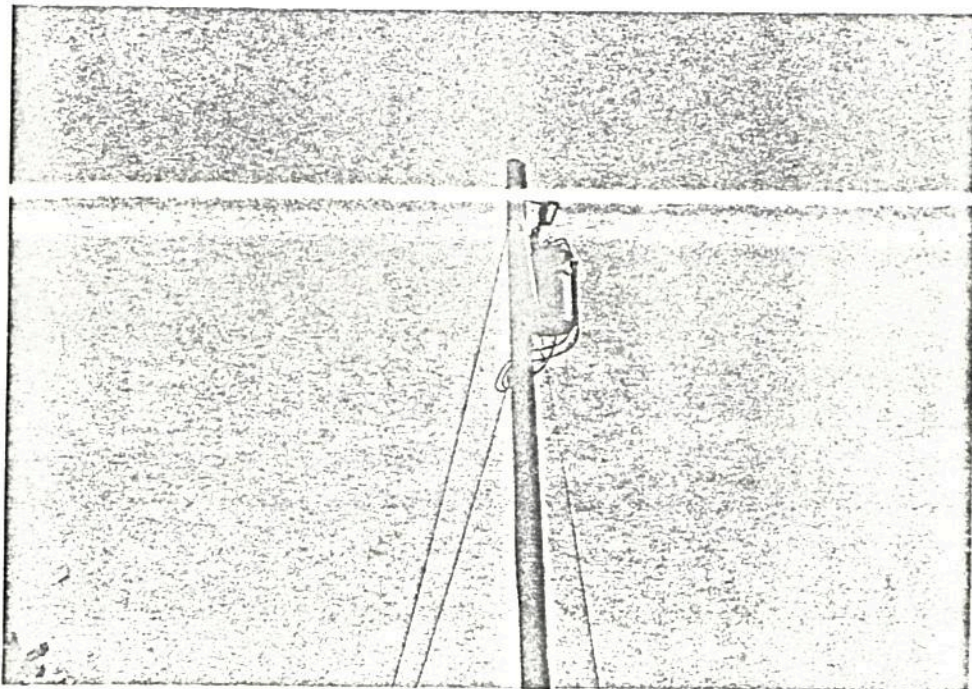
Cleared area where drum burial is suspected. Note transformer and PEPCO command post in foreground.

ORIGINAL  
(red)

ORIGINAL  
(Red)



I-beams and columns which would cause interference with a magnetic survey.



Operational transformer which would interfere with magnetometer readings.

Martel Laboratory Services, Inc.

1025 Cromwell Bridge Road

Baltimore, Maryland 21204

(301) 825-7790

Invoice Number 17021

Page \_\_\_\_ of \_\_\_\_ page(s)

Sample W-7834-S, W-7839-S Soils and sediments from United Rigging and Hauling Site, Beltsville, Maryland. P.O. # 46615. Project No. 2734-E277.

O. H. Materials Co.  
P. O. Box 1395  
Glen Allen, Virginia 43060  
Attn: Mr. Sid Archinal

May 23, 1985

All PCB results are given as Arochlor 1260 unless otherwise stated.  
Units are mg/kg (ppm).

ND: not detected  
Detection Limit: 1 mg/kg.


Station No.    PCB concentration

013	160
014	47
016	25
	+56 *
017	128,000
018	8,900
019	58,000
020	42,000
021	47,000
022	6,100
023	36
024	780
025	110
026	73
027	20,000
028	580
029	120
030	16
031	190
032	4.4
033	7.8
034	10
035	1.3
036	25
037	67

\* as Arochlor 1248

Station No.    PCB concentration


038	19
039	92
039R	110
040	5.3
041	12
042	ND
043	ND
044	ND
045	ND
046	ND
047	ND
048	ND
049	ND
050	1.0
051	1.0
052	23
053	ND
054	34
055	61
056	79
057	19
058	28
059	4.4
077	8.3
078	6.8
079	11

  
Robert G. Edwards, Ph.D.  
Vice President

O. H. Materials Co., W-7853-S  
May 23, 1985  
Page 2

Transformer	PCB_concentration
169	6.0
171	ND
172	ND
174	4.2
177	ND
178	ND
179	ND
180	2.3 *
181	ND
183	5.4
185	4.5
187	ND
188	ND
191	33
192	59
193	ND
194	3.1 *
195	ND
197	ND
199	68
202	26
204	ND
206	ND

Transformer	PCB_concentration
207	3.6 *
208	ND
209	ND
210	ND
211	ND
212	ND
213	ND
214	ND
218	8.7
219	ND
221	ND
223	ND
225	8.3
227	ND
228	ND
228R	ND
229	ND
042	ND
058	ND
065	ND
075	ND
075R	ND
Method Blank	ND

  
Robert G. Edwards, Ph. D.  
Vice President



United States  
Department of  
Agriculture

Agricultural  
Research  
Service

General  
Services  
Division

Beltsville, Maryland  
20705

JUL 25 1985

Mr. Kermit Rader  
U.S. Environmental Protection Agency  
Region 3  
841 Chestnut Building  
Philadelphia, PA 19107

Dear Mr. Rader:

This is to inform you that the Potomac Electric Power Company has been in contact with us regarding disposal of transformers to United Rigging and Hauling Company in Beltsville, Maryland. We have attached a copy of our correspondence in reply to this letter which indicates we have requested advice of counsel on this matter.

If you have any questions in this regard, contact Jim Elston of my staff on telephone (301) 436-8300.

S. R. LEAMAN

Enclosure

cc:

Robert Caron  
Robin Aitken